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 DEPARTMENT OF LABOR

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

THE CENTER FOR INVESTIGATIVE  
 REPORTING and WILL EVANS,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF  
 LABOR,

Defendant.

) Case No. 19-cv-05603-SK

) **STIPULATION REGARDING JOINT REQUEST**  
 ) **TO REVISE BRIEFING SCHEDULE**  
 ) **REGARDING MOTIONS FOR SUMMARY**  
 ) **JUDGMENT; [PROPOSED] ORDER**

The parties, by and through their undersigned attorneys, hereby stipulate pursuant to Civil Local Rule 6-1(b) and 7-12, subject to the approval of the Court, to revise the schedule regarding the parties' Motions for Summary Judgment.

1. Pursuant to a stipulated briefing schedule, as extended by the parties and Court Order, Defendant's Motion for Summary Judgment was submitted on March 4, 2020, and Plaintiffs' Cross-Motion and Opposition is due April 6, 2020. The hearing date for the motions is set for May 18, 2020 at 9:30 a.m. Dkt. No. 20, 22.

2. The parties have agreed to adjust the briefing schedule to allow Plaintiffs three additional weeks to file their opening brief due to work disruptions and institutional difficulties in light of the COVID-19 virus.

3. In addition, the parties have agreed to revise the remaining of the briefing schedule accordingly, with the hearing date now changed. The parties jointly propose the following revised schedule, subject to the Court's approval:

- a. Last day for Plaintiffs to file Opposition and Cross-Motion for Summary Judgment: April 27, 2020.
- b. Last Day for Defendant to file Reply and Cross-Opposition: May 11, 2020.
- c. Last Day for Plaintiffs to file Cross-Reply (if necessary): May 25, 2020.
- d. Hearing: June 8, 2020 at 9:30 a.m.

The parties respectfully request that the Court enter an order revising the schedule accordingly.

IT IS SO STIPULATED.

DATED: March 23, 2020

Respectfully submitted,

DAVID L. ANDERSON  
United States Attorney

/s/ Pamela T. Johann\*  
PAMELA T. JOHANN  
Assistant United States Attorney

Attorneys for Defendant

DATED: March 23, 2020

THE CENTER FOR INVESTIGATIVE  
REPORTING

/s/ D. Victoria Baranetsky  
D. VICTORIA BARANETSKY

Attorneys for Plaintiffs

\* I, D. Victoria Baranetsky, hereby attest that I have obtained the concurrence in the filing of this document from Pamela T. Johann.

/s/ D. Victoria Baranetsky  
D. VICTORIA BARANETSKY